

# EXHIBIT J

Tina Blankenship & Mark Blankenship v. Wal-Mart Stores, Inc., et al.  
Deposition of Tina Blankenship  
April 23, 2015

Sheet 6 Page 18

Page 20

00018

01 in the middle. Okay. Who is older, your brother or  
02 your sister?  
03 A My brother.  
04 Q What's your brother's name?  
05 A Todd.  
06 Q And Browning?  
07 A Yes.  
08 Q And does he work outside the home?  
09 A Yes.  
10 Q Where does he work?  
11 A He's a coal miner.  
12 Q Okay. Do you know who he works for?  
13 A No.  
14 Q Is he married?  
15 A No.  
16 Q Does he have any children over the age of  
17 18?  
18 A Yes.  
19 Q What are his children's names?  
20 A Over 18?  
21 Q Yes.  
22 A Jessica.  
23 Q And does she still live in Mingo County?  
24 A No.

00020

01 at issue in this case?  
02 A Uh-huh. I bought the food processor. It  
03 was in the summer of 2010. I needed it for cole slaw  
04 for a fundraiser.  
05 Q Okay. Let me ask you, prior to that  
06 time, had you ever owned a food processor?  
07 A No.  
08 Q Okay. Had you ever used a food processor  
09 before?  
10 A Yes.  
11 Q Okay. Where had you used a food  
12 processor previously?  
13 A At home with mom.  
14 Q Your mom?  
15 A Yeah.  
16 Q Do you recall what kind of food processor  
17 your mom had?  
18 A No.  
19 Q Okay. So I take it -- did you buy that  
20 food processor for yourself or did someone buy it for  
21 you?  
22 A No, I bought it.  
23 Q You bought it for yourself?  
24 A Uh-huh.

Page 19

Page 21

00019

01 Q Do you know where she lives?  
02 A Virginia.  
03 Q In Virginia. Okay. And your sister?  
04 A Katelyn Sergeant.  
05 Q And is she married?  
06 A No.  
07 Q And does she work outside the home?  
08 A No.  
09 Q Okay. Any particular reason she doesn't  
10 work outside the home?  
11 A She's in school.  
12 Q How old is she?  
13 A Twenty.  
14 Q So she's a young sister?  
15 A Yeah.  
16 Q Okay. Gotcha. Is she in school in West  
17 Virginia or is she out of state?  
18 A In West Virginia.  
19 Q In the timeframe of July 26th of 2013,  
20 would it have just been you and your husband and your  
21 son who resided with you at your residence?  
22 A Yes.  
23 Q Can you tell me a little bit, as best you  
24 can recall, about when you obtained the food processor

00021

01 Q Okay. So you bought it at the Wal-Mart?  
02 A Yeah.  
03 Q And you'll have to forgive me, what Wal-  
04 Mart do you typically shop at?  
05 A The one in South Williamson, Kentucky.  
06 Q Is that just closer for you distancewise  
07 or is there any particular reason you use the one at  
08 South Williamson?  
09 A It's just that's just where we like to  
10 shop.  
11 Q Okay. And I'm the same way. We have  
12 like three Wal-Marts in Morgantown and I always go out  
13 to the one, you know, closer to Grandville, whatever.  
14 So you all typically go to the South Williamson,  
15 Kentucky --  
16 A Yes.  
17 Q Okay. And you had obviously shopped  
18 there before?  
19 A Yes.  
20 Q Was there anyone at the store who  
21 recommended that particular food processor to you?  
22 A No.  
23 Q Okay. Was there any -- or can you tell  
24 me, as you sit here today, was there any reason that

Tina Blankenship & Mark Blankenship v. Wal-Mart Stores, Inc., et al.  
Deposition of Tina Blankenship  
April 23, 2015

Sheet 11 Page 38

00038

01 Q I thought they had a notation on there  
02 that there was no copay in connection with your  
03 surgery. But you think there was a copay?

04 A I paid a copay to the doctor and that  
05 covered so many months until -- and then at the ER I  
06 would have had a copay.

07 Q Do you have any idea what copay you would  
08 have paid to the doctor? Do you know what -- I mean,  
09 because I know typically when I take my kids, it's a  
10 \$25.00 copay when I go to the doctor.

11 A No. Mine is five.

12 Q Yours is five?

13 A Yeah.

14 Q And so that would have lasted you for all  
15 of your treatments with Dr. Balono, do you think?

16 A I think it was -- yes, I think so.

17 Q Okay. And how about -- you probably have  
18 a better rate on your ER deductible too because mine  
19 is 100 bucks to go to the ER. Do you recall what  
20 yours would have been?

21 A I'm still thinking it's lower. I think  
22 it's --

23 Q You guys have some great benefits.

24 A Yes.

Page 40

00040

01 with Dr. Balono was on October 14th of 2013. Does that  
02 sound -- I won't hold you to the specific day, because  
03 obviously, if you haven't read the medical record --  
04 but does that sound about right in your head?

05 A Yeah. That's --

06 Q Okay. Can you tell me, did you ever -- I  
07 know we were talking about the recall and I know you  
08 told me you didn't see that or didn't know about the  
09 recall until after your injury. Did you ever see the  
10 recall poster posted at the South Williamson store?

11 A No.

12 Q Did you ever see the recall poster posted  
13 at any Wal-Mart if -- and I know you frequently go to  
14 South Williamson, but if you would have gone to any  
15 other Wal-Mart, did you see it at any other Wal-Mart?

16 A No.

17 Q Okay. As you sit here today, have you  
18 ever seen the recall poster posted at Wal-Mart?

19 A No.

20 Q Okay. This is me skipping around again,  
21 I'm sorry. Why don't we kind of fast forward to -- or  
22 rewind, I guess. I'm not going forward in time.  
23 We're going back in time.

24 If we go to July 26th of 2013, tell me

Page 39

00039

01 Q Do you think it would have been about  
02 \$25.00 or less than \$25.00?

03 A I might be five also. I'd have to check.

04 Q Well, I can see why you guys want to keep  
05 those benefits.

06 A Yeah.

07 Q Absolutely. Okay. Other than going to  
08 the emergency room at Logan Regional Medical Center  
09 and going to Three Gables and to see Dr. Balono, have  
10 there been any other medical providers that you have  
11 treated with as a result of your injuries?

12 A That I've treated with?

13 Q Yes.

14 A No.

15 Q So one of the questions I have, in  
16 addition to all these other ones I've been asking you,  
17 have you ever attended any type of physical therapy  
18 for your hand?

19 A No.

20 Q Have you ever been told you need physical  
21 therapy for your hand?

22 A No.

23 Q And at least according to the records  
24 that I have, it looked like the last visit you had

Page 41

00041

01 what you recall doing that day. And, you know, I'm  
02 concerned mostly with you using that food processor on  
03 that particular day.

04 But before you get started, let me ask  
05 you, do you have a recollection -- and I think I know  
06 the answer to this, but I want to ask you, were you on  
07 any medications that day?

08 A No.

09 Q Okay. And, you know, obviously, if  
10 wasn't the Fourth of July holiday at that point in  
11 time, but do you think you would have consumed any  
12 alcohol prior to operating the food processor that  
13 day?

14 A No.

15 Q Okay. That being said, I'll try not to  
16 interrupt you and you tell me what you can remember  
17 from July 26th, 2013.

18 A I was making zucchini bread and as I was  
19 reaching in to remove the blade, which I pushed down  
20 on it, it came on and cut my fingers.

21 Q Okay. Now, I'm probably going to ask you  
22 more questions then you could ever imagine just from  
23 that little bit that you told me. Do you recall about  
24 what time of day it was that you were using the food

Tina Blankenship & Mark Blankenship v. Wal-Mart Stores, Inc., et al.  
 Deposition of Tina Blankenship  
 April 23, 2015

Sheet 13 Page 46

00046

01 A Uh-huh.  
 02 Q - and then you put the lid on top of it?  
 03 A Yes.  
 04 Q And you use chop?  
 05 A Chop.  
 06 Q Okay. And then, tell me, after you were  
 07 done with that, you took the lid off?  
 08 A Yes.  
 09 Q Did you remove the bowl from the base of  
 10 the food processor?  
 11 A With the first batch?  
 12 Q Yes.  
 13 A I probably reached my hand and removed  
 14 the blade and then dumped the zucchini.  
 15 Q Okay. So when you reached your hand into  
 16 the bowl there to take the blade out, did you unplug  
 17 the food processor?  
 18 A No.  
 19 Q Okay. Did you use a spatula or anything  
 20 to help you, you know, go around the bowl at all?  
 21 A Not until I poured it out.  
 22 Q Okay. And so whenever you put your hand  
 23 in the first time, after you were done with the first  
 24 batch and you put your hand in to remove the blade,

Page 48

00048

01 A Yes.  
 02 Q Okay. So then after you rinse it out, do  
 03 you dry it off?  
 04 A Yes.  
 05 Q Okay. And then do you put the blade in  
 06 it before you put it back into the food processor or  
 07 when did you put the blade back into it?  
 08 A I would have put the bowl first and then  
 09 the blade.  
 10 Q Okay. And so you would put the bowl  
 11 first and then the blade. Would you have put the bowl  
 12 back on the food processor before you put the blade in  
 13 it --  
 14 A Yes.  
 15 Q - or would you have done that like over  
 16 by the sink, you know, when you were drying it off,  
 17 putting the blade back --  
 18 A No.  
 19 Q - in and then putting it over?  
 20 A I would put the bowl on.  
 21 Q You would put the bowl on --  
 22 A And then the blade.  
 23 Q - the food processor?  
 24 A Yes.

Page 47

00047  
 01 did it jump on you at all?  
 02 A No.  
 03 Q Okay. Did you have any issues at all  
 04 when you put your hand in to remove the blade?  
 05 A No.  
 06 Q Okay. When you went to remove the blade  
 07 that first time, was it still properly seated where it  
 08 was supposed to be inside the food processor?  
 09 A I think so.  
 10 Q Okay. And everything was chopped up how  
 11 you expected it to be?  
 12 A Uh-huh.  
 13 Q Okay. Is that a yes? I'm sorry.  
 14 A Yes.  
 15 Q See, I told you I was going to call you  
 16 on it. So you take the blade out, you remove the bowl  
 17 from the food processor and then you take your  
 18 zucchini and I take it you put it in another bowl --  
 19 A Yes.  
 20 Q - that you're mixing your zucchini bread  
 21 with?  
 22 A Yes.  
 23 Q Okay. Do you rinse the bowl out before  
 24 you put it back on the food processor?

Page 49

00049

01 Q And then the blade. Okay. And then you  
 02 would have put your second batch of chunked zucchini  
 03 into the bowl, put it on and you put it on chop again,  
 04 correct?  
 05 A Yes.  
 06 Q Did it do what it was supposed to do, it  
 07 chopped everything up?  
 08 A No.  
 09 Q It didn't. Okay. What happened?  
 10 A There was a couple chunks of zucchini  
 11 that hadn't got mixed up.  
 12 Q Okay. And so had you taken the lid off  
 13 to see this?  
 14 A I could see it through --  
 15 Q You could see --  
 16 A -- through the bowl.  
 17 Q Okay. You could see it through the bowl.  
 18 Okay. So what did you do at that point?  
 19 A I took the lid off and reached my hand  
 20 inside and then when I touched the blade, that's when  
 21 it came on.  
 22 Q And I just want to make sure I  
 23 understand. When you took the lid off, what were you  
 24 intending to do?

Dena A. Belisle, CCR, Capitol City Reporting

P. O. Box 11394

Charleston, West Virginia 25339

Tina Blankenship & Mark Blankenship v. Wal-Mart Stores, Inc., et al.  
 Deposition of Tina Blankenship  
 April 23, 2015

Sheet 29 Page 110

00110  
 01 A No.  
 02 Q I think, now don't hold me to this, but I  
 03 thought you had to be at least 16 to have a Facebook  
 04 page. Do you all supervise his Facebook page?  
 05 A Yes. It's mostly for his basketball  
 06 team.  
 07 Q Did your son post anything on Facebook  
 08 about your injury?  
 09 A I'm not for sure. I don't think so.  
 10 Q Okay. How about your husband, does he  
 11 have a Facebook page?  
 12 A No.  
 13 Q Okay. And I apologize, because I think  
 14 you answered this. Did you ever actually talk to  
 15 anyone at the Consumer Product Safety Commission?  
 16 A No. It was just something online.  
 17 Q Just something online?  
 18 A Uh-huh.  
 19 Q Did you ever receive a response to your  
 20 --  
 21 A No.  
 22 Q -- email?  
 23 A No.  
 24 Q Okay. And you didn't keep a copy of that

Page 112

00112  
 01 Q Okay. So as I understand, I think from  
 02 the information that you provided in your complaint on  
 03 August 7th, 2013, you returned to food processor to  
 04 Wal-Mart?  
 05 A Yes.  
 06 Q Okay. Did you do that by yourself or did  
 07 your husband drive you over there?  
 08 A Mark went with me.  
 09 Q Okay. Anyone besides you and Mark?  
 10 A Colton was possibly with us, but I don't  
 11 remember.  
 12 Q Okay. And I think you told me earlier  
 13 that, you know, you didn't have a box to put the food  
 14 processor back in. Did you get like all of the --  
 15 like the kneader, I think you said, and all of the  
 16 tools that came with it and just kind of put it in a  
 17 bag or --  
 18 A Yes.  
 19 Q -- and take it back?  
 20 A Yes.  
 21 Q Okay. And was your husband with you when  
 22 you went to the customer service desk at Wal-Mart?  
 23 A Yes.  
 24 Q Okay. And so he was there when you

Page 111

00111  
 01 email that you sent?  
 02 A No.  
 03 Q Okay. And how did you get the number for  
 04 GE to call them?  
 05 A I think it was just online. I think I  
 06 Googled GE customer service or something.  
 07 Q Okay. And I think, as I recall your  
 08 testimony, you did not tell them you were injured  
 09 using the food processor?  
 10 A I don't remember if I did.  
 11 Q Okay. Did you ever receive any  
 12 correspondence directly from GE?  
 13 A No.  
 14 Q Okay. Did you ever contact Wal-Mart  
 15 directly about your injury with the food processor?  
 16 A No.  
 17 Q Okay. So it was a couple days later, I  
 18 think you said after this incident happened, that you  
 19 had called GE and they -- and you advised them that  
 20 you were late finding out about the recall and they  
 21 directed you to return it to Wal-Mart?  
 22 A Uh-huh.  
 23 Q Is that a yes? I'm sorry.  
 24 A Yes.

Page 113

00113  
 01 returned the product?  
 02 A Yes.  
 03 Q Okay. When you went to return the  
 04 product, tell me what you told them at Wal-Mart, why  
 05 you were returning the product?  
 06 A I told them that -- well, they could see  
 07 I'd been injured. I was all bandaged up and I told  
 08 them that there had been a recall on it and the clerk  
 09 wasn't for sure if she could take it back because the  
 10 -- the recall wasn't still on the board.  
 11 But GE, that -- whoever I'd spoke with  
 12 had gave me a number and said if they had a question,  
 13 they could call them and so I just gave her all that.  
 14 And she called GE and got what she needed to do the  
 15 refund.  
 16 Q Okay. And did you, in fact, get your  
 17 money back?  
 18 A I got a gift card.  
 19 Q Okay. Was that acceptable to you or did  
 20 you want the cash?  
 21 A Well, I -- you know, it was fine.  
 22 Q Okay. At the time that you told her that  
 23 there was a recall, did you tell her that you had  
 24 injured your hand using the food processor?

Tina Blankenship & Mark Blankenship v. Wal-Mart Stores, Inc., et al.  
 Deposition of Tina Blankenship  
 April 23, 2015

Sheet 30 Page 114

00114  
 01 A The clerk at Wal-Mart?  
 02 Q Yes.  
 03 A Yes.  
 04 Q Okay. And tell me exactly what you told  
 05 her, because when you were telling me what had  
 06 happened before, you didn't tell me that you had told  
 07 her that you were injured.  
 08 A I told her I needed to return it, that  
 09 there had been a recall and I had cut my fingers on  
 10 it.  
 11 Q Okay. Do you happen know what this gal  
 12 looked like or what her name was?  
 13 A I remember one I spoke with. Her name  
 14 was like Loretta. She was kind of short, brown hair,  
 15 to the best I can remember.  
 16 Q Okay. Have you ever seen her at the  
 17 store since you've returned --  
 18 A No.  
 19 Q -- the food processor?  
 20 A No.  
 21 Q Okay. Was she at the customer service  
 22 desk?  
 23 A Yes.  
 24 Q Okay. Was she older? Was she younger?

Page 116

00116  
 01 Q Okay. Can you describe who it was that  
 02 said that?  
 03 A It was just the clerk that went over the  
 04 board. She said they normally don't keep the recall  
 05 sheets long enough, so she couldn't find it on the  
 06 food processor.  
 07 Q Okay. Do you know, after you talked to  
 08 -- or after you went online and you found that the  
 09 food processor had been recalled, do you recall what  
 10 time it was that the food processor was actually  
 11 recalled?  
 12 A No, no.  
 13 Q So you didn't know if it had been over a  
 14 year since the food processor had been recalled --  
 15 A I think the date --  
 16 Q -- and you returning it?  
 17 A -- was on there, but I don't recall what  
 18 it was. I think that's why I called GE to see if it  
 19 was still -- if I should still take it back or what I  
 20 should do with it.  
 21 Q Okay. Can you give me any type of  
 22 physical description of those clerks who would have  
 23 said that they don't keep the recall sheets up long  
 24 enough?

Page 115

00115  
 01 A Possibly my age.  
 02 Q Okay. Did you tell her that you had cut  
 03 your fingers on the food processor?  
 04 A Yes.  
 05 Q Okay. And what did she say in response  
 06 to that?  
 07 A Oh, yuck.  
 08 Q Did she ask you if you wanted to fill out  
 09 a report?  
 10 A No.  
 11 Q Did you ask to fill out a report?  
 12 A No.  
 13 Q Was Loretta the one who called GE to see  
 14 about the return?  
 15 A Yes.  
 16 Q Who else did you talk to at Wal-Mart that  
 17 day?  
 18 A There was a couple more clerks there that  
 19 went over to see if the recall sheet was still on the  
 20 board, but I don't recall their names.  
 21 Q Okay. And I think you had indicated that  
 22 someone made the statement that the recall poster  
 23 hadn't been listed long enough.  
 24 A Yes.

Page 117

00117  
 01 A No. I remember one had sandy hair, but I  
 02 don't recall. I think they were around my age too.  
 03 Q Did any of them have glasses?  
 04 A I don't remember.  
 05 Q Were they all white?  
 06 A Yes.  
 07 Q I think you had also mentioned in your  
 08 discovery responses that someone said that the food  
 09 processor should have been removed from the shelf.  
 10 A Uh-huh.  
 11 Q Okay. Who said that, the same person,  
 12 the same sandy-colored --  
 13 A I think so.  
 14 Q -- hair lady?  
 15 A One of them said make sure they're all --  
 16 they should all be removed from the shelf, something  
 17 to that effect.  
 18 Q Okay. When you went to the store that  
 19 day, did you look for a new food processor?  
 20 A No.  
 21 Q Okay. Do you know if there were any of  
 22 this food processor still on the shelves at the store  
 23 on the day that you returned it?  
 24 A No.

Tina Blankenship & Mark Blankenship v. Wal-Mart Stores, Inc., et al.  
Deposition of Tina Blankenship  
April 23, 2015

Sheet 31 Page 118

00118  
01 Q Okay. At the time that you returned that  
02 food processor, had you contemplated suing GE or Wal-  
03 Mart?  
04 A No.  
05 Q -- as a result of your injuries?  
06 A No.  
07 Q When did you first think about filing a  
08 lawsuit?  
09 A The longer it went and I realized the  
10 main reason that I'd bought the food processor was the  
11 same reason I got hurt and we just decided then.  
12 Q Okay. When would that have been in  
13 relation to the date of your injury?  
14 A I don't recall the exact date.  
15 Q Okay. Was it within a week of returning  
16 the food processor --  
17 A Oh, no.  
18 Q -- to Wal-Mart?  
19 A No.  
20 Q A month?  
21 A It was months.  
22 Q Months later?  
23 A Yeah.  
24 Q At the time that you were thinking about

Page 120

00120  
01 make sure that they kept that food processor?  
02 A No.  
03 Q Okay. Did you know anyone who worked at  
04 that South Williamson, Kentucky store?  
05 A No.  
06 Q Okay. Since your injuries and when you  
07 went online and you found that the product had been  
08 recalled, have you personally talked to anyone else  
09 who alleges that they have been injured by this food  
10 processor?  
11 A No.  
12 Q Okay. So you've never had any  
13 conversations with a gal by the name of Andrea Lock?  
14 A No.  
15 Q How did you find Mr. Carr?  
16 A I just was looking.  
17 Q Okay. Where were you looking, in the  
18 phonebook? Were you looking online?  
19 A No. I think I was online and had made an  
20 email or something. I can't remember.  
21 Q Okay. Did you reach out to Mr. Carr  
22 first or did Mr. Carr reach out to you?  
23 MR. CARR: I'm going to object to the  
24 extent that how we communicated with each other!

Page 119

00119  
01 filing a lawsuit, had you -- you'd already had your  
02 surgery?  
03 A Yes.  
04 Q And had you finished treating with Dr.  
05 Balono?  
06 A Yes.  
07 Q Okay. At any point in time when you  
08 returned the food processor to Wal-Mart, did you ask  
09 them to keep it for you?  
10 A No.  
11 Q Okay. Did you say, look, you might want  
12 to keep this because I injured my hand on it?  
13 A No.  
14 Q Did your husband make any comments or  
15 have any conversations with the clerks?  
16 A No.  
17 Q Or was it just you?  
18 A He was there with me, but I don't recall  
19 anything particular that they said.  
20 Q Okay. How about anything particular that  
21 your husband said to any of the Wal-Mart personnel?  
22 A No, I don't remember anything.  
23 Q Okay. As you sit here today, do you  
24 remember your husband telling anyone at Wal-Mart to

Page 121

00121  
01 think goes to the attorney/client privilege and so how  
02 she communicated with me and how I communicated with  
03 her, even if she's just a perspective client, would  
04 still be an attorney/client privilege, so on that  
05 particular question, I would instruct her not to  
06 answer.  
07 MS. NOEL: Okay. Because I think the  
08 substance of your communication would absolutely be  
09 privileged, but I don't know that I agree with you  
10 that whether you reached out to her or, you know, she  
11 reached out to an internet ad or something. I don't  
12 know necessarily think that I agree with you.  
13 BY MS. NOEL:  
14 Q But let me ask you this way. Did you  
15 find an internet advertisement, you know, reflecting  
16 Mr. Carr's services?  
17 A No.  
18 Q Okay. Did someone recommend Mr. Carr to  
19 you?  
20 A No.  
21 Q Okay. At the time that you retained Mr.  
22 Carr to represent you in this case, had you contacted  
23 anyone at Wal-Mart about being injured?  
24 A No.

Tina Blankenship & Mark Blankenship v. Wal-Mart Stores, Inc., et al.  
Deposition of Tina Blankenship  
April 23, 2015

Sheet 32 Page 122

00122

01 Q Okay. The first correspondence that I  
02 have from Mr. Carr is dated June 13th, 2014. Does that  
03 sound about around the time that you retained Mr. Carr  
04 to represent you in this matter about almost a year  
05 after your incident?

06 A Probably, yeah.

07 Q Okay. After you retained Mr. Carr, did  
08 you ever go back to the South Williamson store and ask  
09 them if they still had the food processor?

10 A No.

11 Q Okay. So you never asked them if you  
12 could get the food processor back?

13 A No.

14 Q To the extent you're not on Facebook, I  
15 take it you don't blog?

16 A No.

17 Q Okay. And do you post on your son's  
18 Facebook account?

19 A No.

20 Q I was going to ask, do you still happen  
21 to have the original return receipt or did you provide  
22 that to your attorneys whenever the food processor was  
23 returned?

24 A I gave it to him, I believe.

Page 124

00124

01 you don't have full range of motion in your index  
02 finger?

03 A Yes.

04 Q Okay. What other problems do you have  
05 with your hand -

06 A I have -

07 Q -- your fingers, I'm sorry.

08 A -- tingling, like they're numb underneath  
09 and I get burning sensations through the index finger  
10 and some sharp pain through the top of my hand.

11 Q Okay. And let me back you for just a  
12 minute. That tingling sensation that you get, is that  
13 in all of your fingers or is it just your index and  
14 your middle?

15 A It's just the two, index and the middle.

16 Q Okay. And is that something that you  
17 have all the time or is there something that you do  
18 that causes you to have this tingling sensation?

19 A It's not all the time, but like when I  
20 drive, I have to take my fingers off the steering  
21 wheel. It makes them feel funny.

22 Q Okay. Is it kind of like a pins and the  
23 - pins and needles -

24 A Yeah, like it's asleep.

Page 123

00123

01 Q Was there any particular reason why you  
02 kept that receipt?

03 A No.

04 Q Because I'm just wondering because I --  
05 well, let me ask you this, when you returned the food  
06 processor to Wal-Mart, did you return the instruction  
07 manual with it?

08 A No.

09 Q But you held onto the sales receipt -- or  
10 the return receipt, I'm sorry?

11 A Yes.

12 Q Okay. Why did you think it was important  
13 to give that to Mr. Carr?

14 A Actually, I had just found it in the  
15 hutch and thought, well, this is where I returned that  
16 food processor.

17 Q Gotcha. Okay. Do you currently have a  
18 food processor in your house?

19 A No.

20 Q Okay. I know I've asked you this to some  
21 extent, but I just want to make sure I have a complete  
22 understanding of the problems that you allege you  
23 still have with your hand.

24 As I understand them, you still have --

Page 125

00125

01 Q -- like when it falls asleep?

02 A Yeah.

03 Q And when it does that, how long does it  
04 kind of stay in that sleeping mode?

05 A For a while. It just varies.

06 Q More than an hour?

07 A Maybe not that long, no.

08 Q Does it do it a couple times during a day  
09 or is it like, you know, once a week or --

10 A No. It's every day. Just driving down  
11 the road, it'll make it feel that way. And then I can  
12 set my hand off the steering wheel and flex them a  
13 little bit and it will come back.

14 Q It'll come back?

15 A Yeah.

16 Q Okay. Now, this burning sensation, I  
17 think you said that as in your index finger.

18 A Uh-huh. It's through the scar part.

19 Q Okay. And that's through the scar. Is  
20 that a constant or is it like, you know, when there's  
21 pressure on your hand that it feels like it's burning?

22 A It burns off and on throughout the day at  
23 different times, but it's always numb on that scar.

24 Q Okay. And is that middle finger the

Dena A. Belisle, CCR, Capitol City Reporting

P. O. Box 11394

Charleston, West Virginia 25339